



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 6, 2018

Via ECF

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
United State Courthouse  
500 Pearl Street, Courtroom 14C  
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte*, S1 17 Cr. 548 (PAC)**

Dear Judge Crotty:

We write at the direction of the Court to provide an update concerning the defendant's access to discovery.

As the Court is aware, during the last conference on June 28, 2018, defense counsel indicated that the defendant was unable to view some of the discovery on the computers available at the Metropolitan Correctional Center ("MCC"). To resolve the issue, yesterday, the Government delivered to the MCC for the defendant a laptop and a set of hard drives. The hard drives contain a reproduction of all the discovery material in this case, including forensic images of dozens of electronic devices. The laptop contains software that the Government has confirmed is capable of viewing the discovery on the hard drives except for a small number of the forensic images, in particular that of a multi-terabyte server (the "Limited Images").

Viewing the Limited Images requires a more powerful laptop and additional software, which are not readily available to the Government.<sup>1</sup> Nevertheless, the Government will be making

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<sup>1</sup> On May 1, 2018, the Government provided defense counsel with the specifications for a computer and additional software to view the Limited Images.

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a copy of the Limited Images, as well as the equipment necessary to view those images, available for the defendant's review at the Federal Bureau of Investigation. As the Government stated during past Court appearances, some of the discovery—including child pornography found on the defendant's personal computer and a classified document found on another electronic device—cannot be produced directly to the defendant but is being made available for his review at the FBI. The Limited Images will be made available at the same location, and the Government is working with defense counsel to schedule days on which the defendant will be produced to the FBI to review those materials.

Respectfully submitted,

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United States Attorney

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Cc: Defense Counsel (via ECF)